



A PROFESSIONAL
ASSOCIATION

ROBERTO
ROJAS

RUBEN
OLIVA

FOUNTAIN SQUARE

15800 PINES BLVD.

SUITE 206

PEMBROKE PINES, FL

33027

TEL.

305.373.6868

FAX

305.373.6768

WWW.
ROJASOLIVA
.COM

ATTORNEYS

&

COUNSELORS

AT LAW

February 10, 2014

The Honorable Sandra L. Townes
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

RE: United States v. Luis Calle-Serna
Criminal Docket No. 06 CR 091 (S 3) (SLT)

Dear Judge Townes:

The above referenced matter is scheduled for a status conference on February 14, 2014 at 2:30 P.M.. This matter has been scheduled for a chance of plea on March 4th, 2014 at 2:00 P.M. before the Honorable Magistrate Judge Pollack. Accordingly, the parties would respectfully request that the status conference be either adjourned or cancelled in light of the Defendant's upcoming change of plea. Accordingly, counsel has conferred with the Assistant United States Attorney, Tyler Smith, Esq., who does not object to the relief requested herein.

Accordingly, the parties jointly request that the Court adjourn or cancel the status conference. The parties respectfully request that the Court exclude the time from February 14, 2014 through the date of the change of plea or a new status conference date as scheduled by the Court. The parties submit that such an exclusion would serve the ends of justice in this matter and outweighs the best interest of the public and the defendant in a speedy trial pursuant to Title 18, United States Code, Section 3161(h)(7)(A), because it will allow the parties to finalize their disposition of this case. The Government joins in this request.

Respectfully submitted,

Ruben Oliva, Esq.

Cc: Justin Lerer, AUSA
Tyler Smith, AUSA